

REMARKS

Claims 1 and 5 are pending. By this Amendment, claim 1 is amended and claim 3 is canceled without prejudice or disclaimer. Reconsideration in view of the above amendments and following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. § 1.116 as the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not present any new issues that would require further consideration and/or search as the amendments merely incorporate the subject matter of dependent claim 3 into independent claim 1; (c) do not present any additional claims without canceling a corresponding number of claims; and (d) place the application in better form for appeal, should an appeal be necessary, by reducing the issues for appeal (i.e. remove the rejection under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph). The amendments are necessary and were not earlier presented as they are in response to the rejection under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph contained in the final Office Action. Entry of this Amendment is respectfully requested.

Claims 1 and 3-5 were rejected under 35 U.S.C. § 102(b) over Bulgrin (U.S. Patent No. 5,997,778). The rejection is respectfully traversed.

Claim 1 recites, *inter alia*, that adjustment of the servo delay is made for each of low-velocity section, high-velocity section, and deceleration section of a shot of the injection operation. Claim 1, as amended to include the features of claim 3, also recites, *inter alia*, that the value of the servo delay is set in advance.

With respect to the features recited in canceled claim 3, the Examiner alleges that Bulgrin disclose these features in column 21, lines 19-35 and column 22, lines 24-33. It is respectfully submitted that Bulgrin do not disclose these features, either in column 21, lines 19-35, column 22, lines 24-33, or anywhere in his disclosure.

In column 21, lines 19-35, Bulgrin merely discloses that the  $x_1$  (current position of ram 14) and  $x'$  (velocity of ram 14) of the finite impulse response (FIR) equation has the advanced time ( $\Delta t$ ) applied depending on the use of the FIR filter. Three FIR filters (for the delay of PLC 34, valve delay, and system delay) are used to determine the predictive position signal. Column 22, lines 24-33, merely discloses that other types of FIR filters or recursive type filters can be used. However, there is no disclosure or suggestion that the value of the servo delay is set in advance. Accordingly, Bulgrin cannot anticipate or render obvious claim 1.

Claim 5 recites additional features of the invention and are allowance for the same reasons discussed above with respect to claim 1 and for the additional features recited therein.

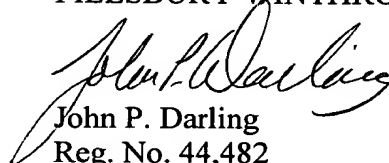
Reconsideration and withdrawal of the rejection of claims 1 and 5 over Bulgrin are respectfully requested.

In view of the above remarks, Applicants respectfully submit that all of the claims are allowable and that the entire application is in condition for allowance.

Should the Examiner believe that anything further is desirable to place the application in condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP



John P. Darling  
Reg. No. 44,482  
Tel. No. (703) 770-7745  
Fax No. (703) 770-7901

Date: May 30, 2006

P.O. Box 10500  
McLean, VA 22102  
Tel. No. (703) 770-7900